

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:24-CR-00361 RWS
	)	
MONIQUE CAMPBELL,	)	
	)	
Defendant.	)	

**INFORMATION**

**BACKGROUND**

1. At all times relevant to this Indictment:
  - a. Saint Louis County was a local government that received Federal assistance in excess of \$10,000 during the calendar year of 2019.
  - b. Defendant was an employee and agent of Saint Louis County, whose duties included being a medical assistant for the Health Department.

**COUNT I**

The United States Attorney charges that:

2. On or about December 18, 2019, in the Eastern District of Missouri,

**MONIQUE CAMPBELL,**

the Defendant herein, did corruptly solicit, demand, accept and agree to accept a thing of value, that is \$500 cash, from a person, intending to be rewarded in connection with a transaction and a series of transactions of Saint Louis County involving \$5,000 or more, that is, the threat of shutting down a convenience store for health violations.

In violation of, and punishable under, Title 18, United States Code, Section 666(a)(1)(B).

**COUNT II**

The United States Attorney charges that:

3. On or about December 23, 2019, in the Eastern District of Missouri,

**MONIQUE CAMPBELL,**

the Defendant herein, did corruptly solicit, demand, accept and agree to accept a thing of value, that is \$1,500 cash, from a person, intending to be rewarded in connection with a transaction and a series of transactions of Saint Louis County involving \$5,000 or more, that is, the threat of shutting down a convenience store for health violations.

In violation of, and punishable under, Title 18, United States Code, Section 666(a)(1)(B).

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ John J. Ware  
JOHN J. WARE, #40880MO  
Assistant United States Attorney  
111 South 10th Street, Room 20.333  
St. Louis, Missouri 63102  
(314) 539-2200

UNITED STATES OF AMERICA )  
EASTERN DIVISION )  
EASTERN DISTRICT OF MISSOURI )

I, John J. Ware, Assistant United States Attorney for the Eastern District of Missouri, being  
duly sworn, do say that the foregoing information is true as I verily believe.

/s/ John J. Ware  
JOHN J. WARE, #40880MO

Subscribed and sworn to before me this 26th day of June, 2024.



Nathan M. Graves  
CLERK, U.S. DISTRICT COURT

By: /s/ JKL  
DEPUTY CLERK

*[Handwritten signature]*